REMARKS

This amendment is in response to the Final Official Action mailed June 28, 2006, and accompanies a Request for Continued Examination under 37 C.F.R. § 1.114. The Examiner is thereby requested to withdraw the finality of the outstanding office action.

In the present paper, claim 27 has been added. Claims 6 and 16 were canceled in a previous paper. Claims 1-5, 7-15 and 17-27 are presented for the Examiner's consideration in view of the following remarks:

The Present Invention

The present application is directed to a call processing center capable of accepting calls from a plurality of disparate telecommunications networks. Specifically, agent availability information is shared among the disparate networks through an Agent Availability Network Control Point (AA NCP) that may reside in the call processing center (present spec., p. 6, lines 3-17). The AA NCP contains an I/O module that interfaces with each disparate telecommunications network (p. 6, line 18 – p.7, line 1). The AA NCP further contains modules for tracking agents and for routing calls through the disparate networks (p. 6, line 14 - p. 7, line 10).

The inventors have discovered a technique whereby agents, each within each of several disparate networks, have their availability tracked by the AANCP. The AANCP therefore tracks agent availability among multiple disparate caller networks without becoming being involved in connecting calls between the caller networks and an "agent network." Instead, the agents are themselves connected to each disparate network.

The Examiner has rejected claims 1, 2, 4, 5, 7,-12, 14, 15 and 17-26 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,614,783 to Sonesh et al. ("Sonesh") in view of U.S. Patent No. 6,256,620 to Jawahar et al. ("Jawahar"), and has rejected claims 3 and 13 under 35 U.S.C. § 103(a) as unpatentable over Sonesh in view of Jawahar and further in view of U.S. Patent No. 5,987,116 to Petrunka et al. ("Petrunka").

Discussion

Applicants respectfully assert that, for the reasons stated below, the claims as amended are not anticipated by or obvious over the cited art because each and every limitation of the independent claims is not found those references

Claims 1-5, 7-15 & 17-27: The Sonesh *Patent Does Not Teach Agents within Disparate Networks*

A feature of the present invention is the ability to connect a caller to an agent within the caller's network, while taking into consideration whether the agent is busy with a caller in another, disparate network. There is no need to translate or convert from one network protocol to another. Instead, the agent has a direct interface with each of the disparate networks (present application, page 6, line 18 – page 7, line 1).

Claim 1, for example, requires: "the agent being coupled within each disparate telecommunications network." Independent claims 11, 21 and 22 contain similar limitations. New claim 27 requires that transmitted routing instructions are "to complete a call within the requesting network from the user to the selected agent."

The Examiner has cited Sonesh at elements 113, 112; col. 7, lines 1-20; and FIGS. 2 & 3 as disclosing that limitation. Applicants submit that Sonesh does not disclose any agent that is "coupled within each disparate network" as required by the independent claims. At most, the agents 120, 121 are each coupled to a single network. For example, agent 121 is coupled to network 112, and agent 120 is coupled to network 113. No agent is "coupled within each disparate network" as required by the claims.

Additionally, the elements 113, 112 in Sonesh, which are cited by the Examiner in the discussion of the subject claim element, are both Internet data networks, and are "disparate" networks as defined in the present specification (p. 2, lines 7-17).

The passage in column 7 cited by the Examiner is directed to "callers," not agents.

For each of the above reasons, Applicants respectfully traverse the Examiner's rejections of the claims, and request that those rejections be withdrawn.

New Claim 27

Applicants submit that new claim 27 is patentable over the cited art for at least the following reasons in addition to those set forth above.

The art of record does not disclose any agent that is connected to receive calls transmitted only through network elements of a first communications network, *and* connected to receive calls transmitted only through network elements of a second communications network. Instead, Sonesh discloses agent 121 connected only to the network 112, and agent 120 connected only to network 113.

The art of record does not teach or suggest "an agent update module for determining an availability of each of the plurality of agents based on an availability status in the first

telecommunication network and on an availability status in the second telecommunication network." Nowhere in Sonesh or in other art of record is there a teaching of determining availability of an agent based on availability status in more than one disparate network.

The art of record does not teach or suggest "a routing options module containing information relating to routing strategies within the first and second networks," or "a statistical program module for analyzing the routing strategies." The system of the invention permits routing by "looking down" at the networks, as opposed to a conventional router-to-router technique (present specification at p. 9, lines 9-12). Thus, the claimed routing options module contains routing strategy information relating to each of the disparate networks. In contrast, the MMACD of Sonesh uses a router-to-router technique, simply transmitting the caller's data (not routing data) to the agent for setting up a virtual data link (Sonesh, col. 7, lines 29-35).

The art of record furthermore does not teach or suggest an AA NCP that is configured as claimed. The claimed AA NCP receives a query from a requesting network, and selects an agent based on information from the agent update module, which contains availability information for both the requesting network and the other of the first and second networks. Sonesh does not disclose considering agent availability information outside the requesting network.

The AA NCP is further configured to transmit the routing instructions to the requesting network to complete a call within the requesting network from the user to the selected agent. Sonesh instead discloses either transmitting only caller identification data (col. 7, lines 29-32) or, in the case of access from a telephone set, connecting outside the requesting network (i.e., in a data network (col. 8, lines 4-14).

Conclusion

Applicants therefore respectfully submit that all the claims in the case are now in condition for allowance, and earnestly request that the Examiner issue a Notice of Allowance.

Should the Examiner have any questions regarding the present case, the Examiner should not hesitate in contacting the undersigned at the number provided below.

Respectfully submitted,

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